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UNITED STATES DEPARTMENT OF ENERGY FEED MATERIALS PRODUCTION CENTER FERNALD, OHIO

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USEPA/DOE-EPD 3 LETTER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST. CHICAGO, ILLINOIS 60604



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REPLY TO THE ATTENTION OF: 5HS -12

CERTIFIED MAIL RETURN RECEIPT REQUESTED

Mr. James A. Reafsnyder United States Department of Energy Environmental Protection Division P.O. Box E Oak Ridge, Tennessee 37830

Re: D and D Facility

United States Department of Energy Feed Material Production Center

Fernald, Ohio OH6 890 008 976

Dear Mr. Reafsnyder:

In a March 3, 1988, telephone conversation with Catherine McCord, Margaret Wilson provided information regarding conditions discovered during recent utility excavation for a new Decontamination and Decommissioning (D&D) facility in the far northeast corner of the production area of the United States Department of Energy (U.S. DOE) Feed Material Production Center (FMPC). The following events were communicated by Ms. Wilson:

- 1) Westinghouse Materials Company of Ohio's (WMCO) construction contractor, RUST, subcontracted for utility excavation for a new D&D facility. On March 24, 1988, excavation was discontinued after the discovery of buried low-level radioactive material. U.S. DOE was informed of this discovery on March 26, 1988;
- 2) Preliminary investigation indicates that scrap metal and uranium are buried in this area. The material may be residuals from scrap bailing operations. It appears that waste oils were also disposed in this area;
- 3) Three foot test pits were dug in nine locations. Field Instrument for Detecting Low Emitting Radiation (FIDLER) readings ranged from detection up to radiation levels found in feed materials. Ms. Wilson was not aware of the actual readings;
- 4) An Environmental Assessment for this project has been developed but is only in draft form and has not been submitted to the United States Environmental Protection Agency (U.S. EPA);

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- 5) A 125 by 250 foot area has been blocked off; and
- 6) U.S. DOE contractors, ASI and IT, are assessing the situation and were to put together a Scope of Work for an investigation of the area by March 4, 1988. A drilling rig is available for sampling. It will take approximately six weeks before sample results are available. Radiological and chemical analysis will be performed on the samples.

The following are action items developed during the telephone conversation:

- 1) U.S. DOE is to revise the Remedial Investigation (RI) Task 1
 Report: Description of Current Situation to include details
 of the D&D facility. Other work areas not included in the
 draft report should also be considered for inclusion. Do not
 submit a revised draft report until U.S. EPA provides comments
 on the latest draft:
- 2) U.S. DOE is to submit the results of the radiological walkover survey for the D&D area;
- 3) U.S. DOE is to submit FIDLER readings and other field measurements taken in D&D area:
- 4) Review historic air photographs of the area;
- 5) The Work Plan for the Remedial Investigation and Feasibility Study (RI/FS) needs to be revised:
- 6) U.S. DOE is to submit a copy of the Scope of Work for the D&D facility;
- 7) U.S. DOE is going to consider developing a press release regarding the discovery;
- 8) U.S. DOE plans to use a FIDLER, photo-ionization detector (HNu) and organic vapor analyzer (OVA) for field screening; and
- 9) U.S. DOE is going to review groundwater monitoring well information for wells located near the D&D area. Water levels should be checked to confirm flow direction.

The following additional items should also be addressed:

- 1) The Environmental Assessment Report for the new D&D facility should be submitted to U.S. EPA;
- 2) Ground penetrating radar (GPR) and other remote sensing techniques should be used to better define the "disposal" area. An extensive GPR survey should be considered for the facility; with the exception of known waste disposal areas where this activity has already been completed; and

3) Submit analytical results for random soil samples in the D&D facility area.

Please contact Catherine McCord at (312) 886-4436, if you have any questions regarding this matter.

Sincerely yours,

Wm. C. Man Chief

William E. Muno, Chief RCRA Enforcement Branch

Enclosure

cc: Graham Mitchell, OEPA-SWDO Michael Savage, OEPA-CO Margaret Wilson, U.S. DOE